

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Donte DOOLEY

Case No.

Case: 2:21-mj-30411

Judge: Unassigned,

Filed: 08-30-2021 At 11:10 AM

USA v. DONTÉ DOOLEY (CMP)(MLW)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 1, 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

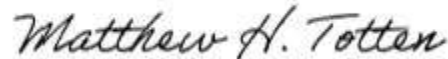
21 U.S.C. 841(a)

Possession with intent to distribute controlled substance

18 U.S.C. 924(c)

Possession of a firearm in furtherance of a drug trafficking crime

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*

Special Agent Matthew Totten - ATF

*Printed name and title*Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: August 30, 2021City and state: Detroit, Michigan*Judge's signature*

Honorable Anthony P. Patti, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Special Agent Matthew Totten, being duly sworn, hereby state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been employed with the ATF for over one year. As a Special Agent, I am currently assigned to the Detroit Field Office. I have conducted and participated in numerous criminal investigations focused on firearms and narcotics violations. I am a graduate of the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. Prior to my employment with ATF, I was employed as a State Trooper with the Michigan State Police for six years from 2014 through 2020. I earned a bachelor's degree from Cedarville University.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including reports from other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. ATF is currently conducting a criminal investigation involving federal firearms and narcotics violations by Donte DOOLEY (DOB: XX/XX/1980). Specifically, DOOLEY is under investigation for violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm), 21 U.S.C. § 841(a) (Possession With Intent to Distribute Controlled Substances); and 18 U.S.C. § 924(c) (Possessing a Firearm in Furtherance of a Drug Trafficking Crime).

**PROBABLE CAUSE**

4. On August 9, 2021, I reviewed a computer printout of DOOLEY's criminal history (CCH), which indicated that DOOLEY has been convicted of the following felony offenses, each punishable by more than one year in prison:

- a. 2006 – Felony Stolen Property – Receiving and Concealing – \$20,000 or more (3<sup>rd</sup> Circuit Court, Detroit, MI);
- b. 2004 – Attempt – Felony Weapons – Carrying Concealed (3<sup>rd</sup> Circuit Court, Detroit, MI);
- c. 2008 – Felony Controlled Substance – Delivery/Manufacture Marijuana/Synthetic Equivalents (3<sup>rd</sup> Circuit Court, Detroit, MI);
- d. 2009 – Felony Controlled Substance – Delivery/Manufacture Marijuana/Synthetic Equivalents (3<sup>rd</sup> Circuit Court, Detroit, MI);

e. 2013 – Felony Police Officer – Fleeing – Fourth Degree – Vehicle Code (6<sup>th</sup> Circuit Court, Pontiac, MI).

5. Based on prior guilty pleas entered by DOOLEY to felony offenses, he knows that he has previously been convicted of a crime punishable by more than one year in prison.

6. On March 31, 2021, I obtained a federal search warrant for the residence located at 19XXX Woodbine St., Detroit, MI, the residence that DOOLEY lists as his address with the Michigan Secretary of State, and a 2007 blue Dodge Caravan with Michigan registration plate: ECXXXXXX, a vehicle that DOOLEY had been observed driving during three controlled buys of narcotics where DOOLEY was believed to have supplied the narcotics.

7. On April 1, 2021, ATF, and TFOs from the Detroit Police Department (DPD) along with the Michigan State Police (MSP) executed the search warrant.

8. During the search warrant execution, agents and officers encountered DOOLEY in the basement near the bathroom. DOOLEY was observed flushing various narcotics down the toilet.

9. Recovered in the search warrant was:

- a. One (1) Smith and Wesson M&P 9C semi-automatic pistol, 9mm, recovered in the basement's northwest corner closet. The firearm contained a magazine that contained 10 rounds of 9mm ammunition.
- b. Approximately 150 gross grams of suspected cocaine, approximately 67 gross grams of ecstasy, and approximately 168 gross grams of marijuana, recovered in the basement's northwest corner closet—the same closet where the gun was located.
- c. Approximately 46 gross grams of suspected heroin and approximately 106 gross grams of methamphetamine recovered from around the toilet, on the floor in the basement.
- d. A pill press and vacuum sealer that appeared to be used for narcotics trafficking were recovered from the basement around the bar area.
- e. In the master bedroom, on the main floor of the residence, assorted ammunition was recovered from the top left dresser

door. In the left side of the closet of the master bedroom, inside shoes, \$18,494.00 of US currency was recovered and seized.

f. A digital scale was recovered from the 2007 blue Dodge Caravan.

10. On August 9, 2021, I spoke to Special Agent Michael Jacobs who is an interstate nexus expert. Based on his training and experience, he stated that the firearm was manufactured outside of the state of Michigan and therefore traveled in or affected interstate commerce.

**CONCLUSION**

11. Probable cause exists that on or about April 1, 2021, in the Eastern District of Michigan, DOOLEY did knowingly possess a firearm while knowing he was a convicted felon, in violation of 18 U.S.C. § 922(g)(1), possessed with the intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a), and possessed a firearm in furtherance of a drug trafficking crime, in violation of 18 U.S.C. § 924(c).

*Matthew H. Totten*

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Matthew Totten  
Special Agent, ATF

Sworn to before me and signed in my presence  
and/or by reliable electronic means

*Anthony P. Patti*

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Hon. Anthony P. Patti  
United States Magistrate Judge

Dated: August 30, 2021